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December 9, 2005

BY E-FILING AND HAND DELIVERY

The Honorable Gregory M. Sleet
United States District Court
844 North King Street
Wilmington, DE 19801

Re: In Re MBNA Corporation Derivative and Class Actions
Lead Case: Civil Action No. 05-327-GMS

Dear Judge Sleet:

Defendants are filing together with this letter a proposed Stipulation and Order which would, if approved by Your Honor, extend until January 20, 2006 the time in which two new defendants may respond to the Consolidated Amended Shareholders' Class and Derivative Complaint filed on November 21, 2005. Defendants are filing this stipulation so that the response of the two new defendants will be due on the same date as the response of the other defendants.

The Consolidated Amended Complaint added Kenneth D. Lewis as a defendant and Bank of America Corporation as a nominal defendant. Pursuant to a Stipulated Order approved by Your Honor on August 25, 2005, the original defendants' response to the Consolidated Amended Complaint is currently due on January 20, 2006. It would be most efficient, and would avoid piecemeal litigation, for the new defendants to respond to the Complaint at the same time as the

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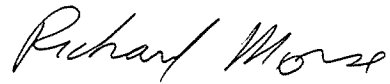
The Honorable Gregory M. Sleet

December 9, 2005

Page 2

original defendants. The Stipulation and Order would permit that. Accordingly, we are submitting it for Your Honor's consideration.

Respectfully yours,

A handwritten signature in cursive script, appearing to read "Richard Morse".

Richard H. Morse (I.D. No. 531)

RHM:mmeeh

cc: Clerk of the Court (By E-filing)
Robert R. Davis, Esquire (By E-filing)
Edward P. Welch, Esquire (By E-filing)
Richard C. Pepperman, II, Esquire (By E-mail)